

From: [Granger, Michelle](#)
To: [Granger, Michelle](#)
Subject: PDI next steps proposal presented on the 7/2/18 call
Date: Wednesday, August 08, 2018 4:34:00 PM
Attachments: [Pohatcong OU3 - Additional delineation borings.pdf](#)

EPA has reviewed the PDI next steps slides and proposal discussed on our technical call on 7/2/18. EPA has two issues with the PDI proposal presented on the call:

1. Scope of the PDI -

EPA believes further delineation to the north of PDI-SB25 and to the south of PDI-SB26 is still necessary. Both PDI-SB25 and 26 were installed within the hallway parallel to the molding room, outside the manufacturing area. Our understanding is that installation of those borings did not require shutdown. For that reason, we would like to know whether two additional borings (see figure attached) can be installed to the north and south of PDI-SB25 and 26, respectively, now while the Albea plant is in operation? These two additional borings are needed in addition to the proposed borings within the manufacturing area to determine the extent of contamination and treatment area.

2. Schedule of the Project -

The OU3 Preliminary Design Report (30% design) is scheduled to be submitted in September 2018. Under paragraph 12 of the Consent Decree and Section VI.C.4, the 30% RD report is to contain the results of the PDI sampling. EPA had expected that all of the results of the PDI would be included in the 30% RD report.

During our technical call with PPPI/Rio Tinto on Monday, July 2nd, EPA was informed that additional sampling needed for the PDI in the manufacturing area adjacent to the molding room is not scheduled for another 5 months until the end of December 2018 when the Albea plant will be shut down for a period of time. Absent additional information from PPPI/Rio Tinto documenting their efforts to secure an earlier date for this sampling from Albea as well as the reasons that an earlier date is not possible, EPA does not consider the December sampling date to be reasonable. The two additional borings mentioned in item #1, the ones north and south of PDI-25 and PDI-26 could be done now, while the plant is in operation; therefore, EPA does not see a reason for delaying those two borings. In addition, in an effort to complete the other two borings sooner, PPPI/Rio Tinto should consider other options, including using two rigs to obtain the soil borings in a shorter period of time which would reduce the impact to Albea's operations. Obtaining the results of the four soil borings sooner than December 2018 will enable those results to be presented in the 90% Design Report to be submitted to EPA in January 2019 and will build in extra time in case those results require stepping out for additional sampling. It is very important to EPA that the final RD report is completed by February 28, 2019 so that this project remains on schedule.

Please feel free to contact me if you have any questions.

Sincerely,

Michelle Granger, EPA RPM